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*Attorneys for Plaintiff and the Putative Class*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

JOANNE KAPLAN, on behalf of herself  
 and all others similarly situated,

Plaintiff,

v.

CRIMSON WINE GROUP, LTD,

Defendant.

) Case No: 3:24-cv-09388

) **STIPULATION AND ~~[PROPOSED]~~**  
 ) **ORDER TO STAY ALL CASE**  
 ) **DEADLINES PENDING MEDIATION**

) Complaint Filed: December 23, 2024  
 ) Trial Date: None Set

Plaintiff Joanne Kaplan (“Plaintiff”), and Defendant Crimson Wine Group, Ltd.  
 (“Defendant”) (collectively, the “Parties”) hereby stipulate under Civil Local Rule 7-12 as follows:

**RECITALS**

WHEREAS, Plaintiff filed the Complaint in this matter on December 23, 2024;

WHEREAS, the Parties have filed a stipulation to extend Defendant’s response deadline to  
 April 2, 2025, which was granted by this Court. Dkt. Nos. 9-10;

WHEREAS, the Parties have conferred and agreed to mediate this case before experienced  
 mediator John DeGroote on June 2, 2025, and request a stay of all pending case deadlines until the  
 conclusion of that mediation;

WHEREAS, good cause exists to enter the Parties’ proposed stay because it would  
 accommodate the upcoming mediation and allow the Parties to focus fully on obtaining early

resolution to this action;

WHEREAS, the Parties have conferred and further agree to provide a status report to the Court within two (2) weeks of the conclusion of the mediation and that, further, Defendant shall have two (2) thereafter to file its response to Plaintiff's complaint, if necessary; and

NOW, THEREFORE, the Parties hereby stipulate and agree, subject to the Court's approval, to stay all current case deadlines up to and including June 2, 2025.

**IT IS SO STIPULATED**

DATED: March 11, 2025

SIRI & GLIMSTAD LLP

By: /s/ Catherine Ybarra

Catherine Ybarra

*Attorney for Plaintiff Joanne Kaplan*

DATED: March 11, 2025

FREEMAN, MATHIS & GARY, LLP

By: /s/ Fredrick A. Hagen

Fredrick A. Hagen

*Attorney for Defendant*

*Crimson Wine Group, Ltd.*

SIGNATURE ATTESTATION

The filer attests, under Civil Local Rule 5-1(i)(3), that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

~~[PROPOSED]~~ ORDER

Pursuant to the parties' stipulation, all case deadlines in this action are stayed pending the mediation scheduled for June 2, 2025, and the parties shall file a status report within 14 days after the mediation informing the Court as to the status of the case, and Defendant shall have 14 days thereafter to file its response to Plaintiffs' complaint, if necessary.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: March 12, 2025 By: \_\_\_\_\_

